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October 24, 2023

Via ECF

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: *Ellis Kaplan v. Valnet Inc.*
Case No: 1:23-cv-06928-AS

Dear Judge Subramanian:

We are the attorneys for Plaintiff Ellis Kaplan ("Plaintiff") in this matter. Pursuant to Rule 3(E) of Your Honor's Individual Practices, we write to respectfully request an adjournment of the initial conference date until at least 14 days after Defendant Valnet, Inc. ("Defendant")'s deadline for responding to the Complaint. The parties further request permission to appear at the initial conference via teleconference or video conference.

Defendant executed a waiver of service on August 24, 2023, setting November 22, 2023 as Defendant's deadline to answer the Complaint (ECF No. 9). The initial conference is currently set for November 7, 2023. Defendant consents to this request and no adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Renee J. Aragona
Renee J. Aragona

cc: Lindsay R. Edelstein, Esq.
Mitchell Silberberg & Knupp LLP
Via email to lre@msk.com

Counsel for Defendant

Both requests are GRANTED. The November 9 conference is rescheduled for November 30, 2023, at 4:30 p.m. It will be held by telephone. The parties should dial 646-453-4442 and enter Conference ID 827 833 452#. The Clerk of Court is directed to close ECF 11.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Arun Subramanian".

Arun Subramanian, U.S.D.J.
Date: October 25, 2023